



Lanny S. Kurzweil
Partner

T. 973-639-2044
F. 973-297-3810

lkurzweil@mccarter.com

McCarter & English, LLP

Four Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056

www.mccarter.com

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VIA ECF

Hon. Renée M. Bumb, Chief United States District Judge
United States District Court, District of New Jersey
4th and Cooper Streets, Courtroom 3D
Camden, NJ 08101

**Re: Defendants EIDP, Inc., The Chemours Company, and The Chemours
Company, FC, LLC's Motion to Strike PFAS Toxicity Evidence
*N.J. Dept. of Enviro. Protection, et al. v. E.I. du Pont de Nemours and Co.,
et al.*, Civil Action No. 1:19-cv-14766 (RMB)**

Dear Chief Judge Bumb:

We write on behalf of defendants EIDP, Inc., The Chemours Company, and The Chemours Company, FC, LLC (collectively "EIDP/CC") to correct an error in their Motion to Strike Plaintiffs' PFAS Toxicity Evidence. Dkt. No. 700.

As Your Honor is aware, on June 30, the parties submitted a Joint Letter (Dkt. No. 699) to which certain deposition designations were attached as exhibits pursuant to the Court's instructions (June 9, 2025 Tr. 2659:1-2661:10), including designations from the deposition of Andrew Hartten bearing the trial exhibit number PTX05298.

In Exhibit 3 to Defendants' Motion to Strike (Dkt. No. 700), the first table correctly lists only the specific PFAS toxicity testimony from Mr. Hartten's deposition transcript EIDP/CC seeks to exclude, but the deposition transcript itself (PTX05298) is mistakenly listed in the second table in whole under "Exhibit Entered." EIDP/CC are not moving to exclude Mr. Hartten's deposition testimony in its entirety. Attached is a corrected Exhibit 3 with changes to correct only this inadvertent oversight noted in red.

Respectfully submitted,

By: /s/ Lanny S. Kurzweil

Lanny S. Kurzweil

Ryan A. Richman

McCARTER & ENGLISH, LLP

Four Gateway Center

100 Mulberry Street

Newark, NJ 07102

(973) 639-2044

lkurzweil@mccarter.com

rrichman@mccarter.com

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By: /s/ Eric G. Lasker**HOLLINGSWORTH LLP**Eric G. Lasker (*Admitted PHV*)Ann Marie Duffy (*Admitted PHV*)Matthew J. Malinowski (*Admitted PHV*)Marchello D. Gray (*Admitted PHV*)David I. Schifrin (*Admitted PHV*)

1350 I Street, NW

Washington, DC 20005

(202) 898-5800

elasker@hollingsworthllp.com

aduffy@hollingsworthllp.com

mmalinowski@hollingsworthllp.com

mgray@hollingsworthllp.com

dschifrin@hollingsworthllp.com

EXHIBIT 3 (CORRECTED)

Defendants move to exclude the following tables of trial testimony and exhibits entered in the Phase 1 Mini Trials from the WPCA mini trial considering the Court's June 3rd Order, but maintain are relevant to the CRACO mini trial:

TRIAL DATE	WITNESS	TESTIMONY
5/19/2025	LaTourette	83:13 – 85:5
5/19/2025	LaTourette	87:16 – 87:18
5/19/2025	LaTourette	107:12 – 112:8
5/19/2025	LaTourette	112:6 – 115:13
5/28/2025	Stahl	1288:22 – 1289:4
5/29/2025	Faranca	1373:4 – 1373:9
5/29/2025	Faranca	1389:6 – 1389:12
5/29/2025	Faranca	1390:22 – 1390:5
5/29/2025	Faranca	1393:8 – 1393:19
5/29/2025	Faranca	1397:4 – 1397:23
5/29/2025	Faranca	1413:11 – 1414:3
5/29/2025	Faranca	1420:25 – 1421:17
5/29/2025	Post	1447:7 – 1449:25
5/29/2025	Post	1450:12 – 1451:20
5/29/2025	Post	1457:10 – 1457:22
5/30/2025	Campbell	1663:13 – 1663:21
5/30/2025	Campbell	1664:5 – 12
5/30/2025	Campbell	1673:15 – 1674:3
5/30/2025	Campbell	1678:23 – 1680:5
5/30/2025	Campbell	1706:12 – 1707:16
5/30/2025	Campbell	1717:6 – 25
5/30/2025	Campbell	1720:7 – 1721:2
Deposition Testimony from PTX05298	Hartten	228:2 – 3
Deposition Testimony from PTX05298	Hartten	228:5 – 16
Deposition Testimony from PTX05298	Hartten	228:19 – 21
Deposition Testimony from PTX05298	Hartten	229:2 – 19

TRIAL DATE	WITNESS	TESTIMONY
Deposition Testimony from PTX05298	Hartten	229:21 – 22

EXHIBIT ENTERED
PTX01552
PTX01692
PTX01719*
PTX01926
PTX02173*
PTX02259*
PTX02376
PTX02552
PTX03291
PTX04124
PTX04024
PTX05298
DX_DP1854
DX_DP1862
DX_DP2682
DX_DP2704
DX_DP2771

*To the extent the exhibit also discusses toxicity of C-8 or PFOA or PFAS, Defendants seek to exclude that information from the WPCA mini trial.